

**BEFORE
THE PUBLIC SERVICE COMMISSION
OF SOUTH CAROLINA
DOCKET NO. 2019-365-E**

IN RE: Exploration of a South Carolina)	
Competitive Procurement Program as)	
Allowed by South Carolina Code)	
Section 58-41-20(E)(2))	
(See Directive Issued on)	
November 25, 2019))	

**PETITION
TO
INTERVENE**

This Commission established Commission Docket 2019-365-E, on November 26, 2019, by way of Commission Directive issued on November 25, 2019, in Docket 2018-202-E, wherein this Commission found that a South Carolina competitive procurement system should be considered for South Carolina and authorized its staff to establish this Docket for an exploration of a South Carolina Competitive Procurement Program, as allowed by S.C. Code §58-41-20(E)(2).

Petitioner herein is Cypress Creek Renewables, LLC, (“Cypress Creek” or “Petitioner”). This Petition to Intervene is filed pursuant to R. 103-825, of this Commission’s Rules and Regulations and other applicable Rules and Regulations of this Commission, and Petitioner seeks permission to intervene and be made a party of record in the above-referenced Docket, with full rights of participation.

1. Cypress Creek is a Delaware Corporation, domesticated to conduct business in the State of South Carolina.

2. Cypress Creek is a national solar energy company, with offices across the United States. Cypress Creek develops, finances, constructs and operates solar energy projects that provide communities with affordable energy, new revenue streams, and jobs. Cypress Creek is a leader in the development of utility and community scale solar energy projects, with more than 300 projects and 3.2 gigawatts of local solar facilities currently deployed across the U.S., including projects in South Carolina.

3. Therefore, Cypress Creek is financially impacted by the important decisions to be made by this Commission in this Docket, consistent with S.C. Code §58-41-20(E)(2).

4. This Commission’s compliance with S.C. Code §58-41-20(E)(2) will directly impact the operations of the Petitioner, Cypress Creek, because of Petitioner’s substantial business interests throughout South Carolina, and Cypress Creek has a material interest in the outcome of this Docket.

5. Petitioner has a direct, substantial and material interest in this Docket, Petitioner will be directly impacted by the outcome of this Docket, and Petitioner's interests cannot be adequately addressed by any other party. Therefore, the decisions of this Commission are important to the Petitioner from a financial and business standpoint. Petitioner's Intervention will aid this Commission, by assisting in the development of a full and fair record to address the important decisions to be made in this Docket.

6. Petitioner should be allowed to intervene in this Docket, with full rights of cross-examination, discovery and participation in any Hearing to be scheduled in this Docket.

7. The granting Cypress Creek's Petition to Intervene is (i) in the public interest and (ii) consistent with the policies of this Commission in encouraging maximum public participation in issues before it and intervention should be allowed so that a full and complete record addressing its views and concerns can be developed.

8. This Petition to Intervene is timely filed with this Commission.

9. Petitioner Cypress Creek has previously received approval for intervention from this Commission, including Commission Docket 2018-318-E and Docket 2018-319-E.

10. Cypress Creek is represented by counsel in this proceeding:

Richard L. Whitt,
WHITT LAW FIRM, LLC
401 Western Lane, Suite E
Irmo, South Carolina 29063
Telephone: (803) 995-7719
Richard@RLWhitt.law

WHEREFORE, Petitioner prays for the following relief:

(a) That this Petition to Intervene be accepted and that Petitioner be made a party of record;

(b) That Petitioner be allowed to participate fully in this proceeding and take such positions as it deems advisable; and

(c) For such other and further relief as this Commission may deem just and proper.

[Signature Page Follows]

Respectfully Submitted,
/s/Richard L. Whitt

Whitt Law Firm, LLC

401 Western Lane, Suite E

Irmo, South Carolina, 29063

(803) 995-7719

**Counsel for Petitioner, Cypress Creek
Renewables, LLC.**

December 17, 2019